



RF-98-03841

Mr. Ed Smith  
Hazardous Materials & Waste Management Division  
Colorado Department of Public Health and Environment  
4300 Cherry Creek Drive South  
Denver, CO 80222-1530

RESPONSE TO NOTICE OF INSPECTION DATED 7/17/98, FOR CLARIFER, UNIT 5001  
AND BUILDING 891 - BLC-005-98

Mr. Smith:

Enclosed you will find the response as requested to the above referenced Notice of Inspection (NOI). This response includes the Rocky Mountain Remediation Services, L.L.C. letter to Mr. John Wrapp as well as all attachments as stated.

If you have any questions please feel free to call me at (303) 966-6880.

*Bob Cathel*  
Bob Cathel

Enclosure:  
As stated

Kaiser-Hill Company, L.L.C.

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ADMIN RECORD  
IA-A-000416

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Rocky Mountain  
Remediation Services, L.L.C  
... protecting the environment

## MEMORANDUM

DATE: July 27, 1998

TO: John Wrapp, K-H Environmental Compliance Mgr., T130C, X5883

FROM: T. Hopkins, RMRS Environmental Compliance Mgr., Bldg. 116, X-7652

SUBJECT: RESPONSE TO CDPHE NOTICE OF INSPECTION DATED 7/17/98, FOR U-5001, AND BUILDING 891 OF 7/15/98

CDPHE inspectors Ed Smith and James Hindman inspected RMRS non-regulated waste storage area Unit-5001 (PU&D Cargoes), the clarifier tank, and Building 891 on Thursday, July 16, 1998.

### COMMENT #1:

The NOI reads, "Drum G04788 at the 5001 Yard, Cargo Container #4 is severely dented. Containers storing used oil must be in good condition per 6 CCR 1007-3, Section 279.22(b)(1)".

**RESPONSE:** Drum G04788 is an unused manufacturer's product drum of MobilGuard 450 oil with the manufacturer's seals still in place. There is a dent approximately twelve inches long and one inch deep in the top third of the drum. The drum continues to be structurally sound and in good condition to be shipped per Department of Transportation guidelines. 40 CFR 279.22(b)(1) defines in good condition as no severe rusting, apparent structural defects or deterioration. Since this drum is not leaking and is fit for shipment per DOT requirements, RMRS feels that this drum meets the 40 CFR 279.22(b)(1) definition of "in good condition". It is judgment call of the generator. It is our intention to ship this drum "as is" rather than create an additional empty waste drum.

### COMMENT #2:

The NOI reads, "At Building 891, John Law is identified as a Point-of-Contact (POC) in the vent of an emergency. His TSR indicates that he has not received RCRA Hazardous Waste Training. Because RCRA is an ARAR, Mr. Law should be trained in RCRA waste management if he will continue to be the POC in the event of an emergency.

**RESPONSE:** Mr. Law was designated as the third POC on a sign entering the building. Mr. Law has taken the 40 hour OSHA course, the 8 hour refresher, Incident Commander Training and has over 10 years experience on CERCLA/RCRA Hazardous Waste Sites. His experience and training is more than adequate to qualify Mr. Law as a POC for this facility.

Whether or not he has documented "RCRA Waste Management Training" is clearly an administrative requirement.

**COMMENT #3:**

The NOI reads, "Drum X04832 was designated as non-hazardous but contains sodium sulfite. The attached MSDS states that contact with water produces toxic and corrosive materials. Determine if the waste code of D003 applies and, if so, move this drum to a permitted storage unit. (6 CCR 1007-3 Sections 262.11, 262.34, and 100)".

**RESPONSE:** Sodium sulfite was characterized by the generator as non-hazardous in January of 1996. Concurrence that sodium sulfite does not meet the criteria for RCRA reactivity was obtained per telephone conference with the K-H Team Reactive Chemical Program Manager. (See Attachment #1)

**COMMENT #4:**

The NOI reads, "Drum X01751 contains at least three containers of ferric chloride and has been designated as non-hazardous. Ferric chloride is water reactive producing toxic and corrosive fumes with water. Determine if this waste is hazardous (D003) and, if so, move this drum to a permitted storage unit. (6 CCR 1007-3 Sections 262.11, 262.34, and 100.10)".

**RESPONSE:** The MSDS provided by the generator shows ferric chloride *anhydrous*, which would indeed be water reactive (D003). Physical verification of the chemical containers within this drum revealed all three containers to be ferric chloride 6-hydrate (or ferric chloride hexahydrate). The hexahydrate form of this chemical does not meet the definition of water reactive (D003). Concurrence with this characterization of non-hazardous was obtained per telephone conference with the Reactive Chemical Program Manager. (See Attachment #2)

**COMMENT #5:**

The NOI reads: "Provide the amount of materials in storage for recycling of precious metals (i.e. silver @ 5001 Yard) on January 1, 1997 and the amount of material recycled during 1997".

**RESPONSE:** On January 1, 1997 RMRS had no material in storage at PU&D/U-5001 for precious metals recovery (i.e. silver). One shipment of such materials was made at the end of the calendar year to AMR Industries, Inc. of Phoenix, Arizona on 12/31/97 (please see attached copy of RFETS Shipping Memo No. 21557, Attachment #3). This shipment amounted to an actual weight of 3,915 pounds. Two boxes of circuit boards (WEMS # X08771) for silver reclamation were collected and remained in U-5001 by the end of 1997 which did not make this shipment. X08771 comprises 30 pounds of material, which equates to 0.8% of materials not sent for precious metals recovery during calendar year 1997.

**COMMENT #6:**

The NOI reads: "Provide copies of the waste travelers #X01751 and X04832 with the response to this inspection".

**RESPONSE:** The travelers are provided for your review as attachment #4.